

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

<b>UNITED STATES OF AMERICA</b>	)	Criminal No.	5:23-CR-192 (DNH)
	)		
<b>v.</b>	)	<b>Information</b>	
	)		
<b>MICHAEL GONZALSKI, a/k/a</b>	)	Violations:	21 U.S.C. § 846
<b>“Gonzo,” a/k/a “Frog,”</b>	)		[Conspiracy to Distribute and
	)		Possess with Intent to
	)		Distribute Controlled
	)		Substances]
	)		
	)		21 U.S.C. § 841(a)(1)
	)		[Possession with Intent to
	)		Distribute Controlled
	)		Substance]
	)		
	)		18 U.S.C. § 1956(a)(1)(B)(i)
	)		[Concealment Money
	)		Laundering]
	)		
	)	3 Counts	
	)		
<b>Defendant.</b>	)	County of Offense:	Onondaga

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT 1**

**[Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances]**

From in or about August 2020, through March 30, 2022, in Onondaga County in the Northern District of New York, the defendant, **MICHAEL GONZALSKI, a/k/a “Gonzo,” a/k/a “Frog,”** conspired with others to knowingly and intentionally distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846. That violation involved cocaine and cocaine base, Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(b)(1)(C).

**COUNT 2**  
**[Possession with Intent to Distribute Controlled Substance]**

On or about March 30, 2022, in Onondaga County in the Northern District of New York, the defendant, **MICHAEL GONZALSKI, a/k/a “Gonzo,” a/k/a “Frog,”** knowingly and intentionally possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

**COUNT 3**  
**[Concealment Money Laundering]**

On or about March 10, 2022, in the Northern District of New York, the defendant, **MICHAEL GONZALSKI, a/k/a “Gonzo,” a/k/a “Frog,”** knowingly deposited a check from Person A in the amount of \$6,500.00 into an account with Empower Federal Credit Union, account number XX2247, which transaction affected interstate commerce, and which involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting such financial transactions, the defendant knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**FIRST FORFEITURE ALLEGATION**

1. The allegations contained in Count One of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a)(1).

2. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846, as set forth in Count One, the defendant,

**MICHAEL GONZALSKI, a/k/a "Gonzo," a/k/a "Frog,"**

shall forfeit to the United States of America, any property constituting, and derived from, any proceeds obtained, directly and indirectly, as the result of the offense set forth in Count One. The property to be forfeited includes, but is not limited to, the following:

- a. A money judgment in the amount of \$333,111.00, representing the unrecovered proceeds personally obtained by defendant **MICHAEL GONZALSKI, a/k/a "Gonzo," a/k/a "Frog."**

#### **SECOND FORFEITURE ALLEGATION**

1. The allegations contained in Count Three of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18 United States Code, Section 982(a)(1).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1956, as set forth in Count Three, the defendant, **MICHAEL GONZALSKI, a/k/a "Gonzo," a/k/a "Frog,"** shall forfeit to the United States of America, any property, real and personal, involved in the offenses set forth in Count Three, and any property traceable thereto. The property to be forfeited includes, but is not limited to, the following:

- a. A money judgment in the amount of \$6,500, representing the unrecovered proceeds personally obtained by defendant **MICHAEL GONZALSKI, a/k/a "Gonzo," a/k/a "Frog."**

#### **SUBSTITUTE ASSETS**

If any of the property described above, as a result of any act or omission of the defendant

(a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: May 17, 2023

CARLA B. FREEDMAN  
United States Attorney

By: /s/ Thomas R. Sutcliffe  
Thomas R. Sutcliffe  
Assistant United States Attorney  
Bar Roll No. 700766